

ROBBINS ARROYO LLP
BRIAN J. ROBBINS (#190264)
brobbins@robbinsarroyo.com
STEPHEN J. ODDO (#174828)
soddo@robbinsarroyo.com
ARSHAN AMIRI (#246874)
aamiri@robbinsarroyo.com
EDWARD B. GERARD (#248053)
egerard@robbinsarroyo.com
JUSTIN D. RIEGER (#257321)
jrieger@robbinsarroyo.com
600 B Street, Suite 1900
San Diego, CA 92101
Telephone: (619) 525-3990
Facsimile: (619) 525-3991

Attorneys for Plaintiff

[Additional Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IRON WORKERS MID-SOUTH
PENSION FUND, on Behalf of Itself and
All Others Similarly Situated,

Plaintiff,

v.

FOCUS MEDIA HOLDING LIMITED,
JASON NANCHUN JIANG, KIT
LEONG LOW, NEIL NANPENG SHEN,
FUMIN ZHUO, CHARLES GUO WEI
CAO, DAQING QI, DAVID YING
ZHANG, YING WU, GIOVANNA
PARENT LIMITED, and GIOVANNA
ACQUISITION LIMITED,

Defendants.

Case No. 3:13-cv-00827-JST

NOTICE OF VOLUNTARY DISMISSAL
WITHOUT PREJUDICE PURSUANT TO
RULE 41(a)(1)(A)(i) OF THE FEDERAL
RULES OF CIVIL PROCEDURE

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 WHEREAS, plaintiff Iron Workers Mid-South Pension Fund ("Plaintiff"), on behalf of itself and
3 all others similarly situated, filed the Class Action Complaint for Violations of the Securities Exchange
4 Act of 1934 and Oppression (the "Complaint") challenging the proposed acquisition of Focus Media
5 Holding Limited ("Focus Media") by Giovanna Parent Limited and Giovanna Acquisition Limited, on
6 February 22, 2013 (the "Action") (Dkt. No. 1);

7 WHEREAS, on March 13, 2013, Plaintiff filed a Motion for Preliminary Injunction (Dkt. No.
8 6);

9 WHEREAS, on March 18, 2013, the parties filed the Stipulation and [Proposed] Order Setting
10 Schedule for Defendant Focus Media Holding Limited's Motion to Dismiss and Plaintiff Iron Workers
11 Mid-South Pension Fund's Motion for Preliminary Injunction (Dkt. No. 8);

12 WHEREAS, on March 19, 2013, defendant Focus Media filed its Motion to Dismiss Plaintiff's
13 Complaint Pursuant to FRCP 12(b)(6) and Request for Judicial Notice in Support of Motion to Dismiss
14 Complaint (Dkt. No. 9 and 10);

15 WHEREAS, on March 20, 2013, the Court issued the Scheduling Order re: Motions to Dismiss
16 and for Preliminary Injunction (Dkt. No. 11);

17 WHEREAS, no class of Focus Media shareholders has been certified, and thus, the dismissal of
18 this Action will not prejudice the interests of other Focus Media shareholders; and

19 WHEREAS, no defendant in this Action has answered the Complaint or filed for summary
20 judgment.

21 NOW, THEREFORE, NOTICE IS HEREBY GIVEN that, pursuant to Rule 41(a)(1)(A)(i) of
22 the Federal Rules of Civil Procedure, Plaintiff voluntarily dismisses the Action without prejudice.

23 Dated: March 26, 2013

ROBBINS ARROYO LLP
BRIAN J. ROBBINS
STEPHEN J. ODDO
ARSHAN AMIRI
EDWARD B. GERARD
JUSTIN D. RIEGER

27 /S/ Stephen J. Oddo
STEPHEN J. ODDO

600 B Street, Suite 1900
San Diego, CA 92101
Telephone: (619) 525-3990
Facsimile: (619) 525-3991
brobbins@robbinsarroyo.com
soddo@robbinsarroyo.com
aamiri@robbinsarroyo.com
egerard@robbinsarroyo.com
jrieger@robbinsarroyo.com

ROBEIN, URANN, SPENCER,
PICARD & CANGEMI APLC
MARIA CANGEMI
CHRISTINA CARROLL
2540 Severn Avenue, Suite 400
Metairie, LA 70002
Telephone: (504) 885-9994
Facsimile: (504) 885-9969
mcangemi@ruspclaw.com
ccarroll@ruspclaw.com

THE WARNER LAW FIRM
PAUL T. WARNER
11123 McCracken Lane, Suite A
Cypress, TX 77429
Telephone: (281) 664-7777
Facsimile: (281) 664-7774
pwarner@warner-law.net

Attorneys for Plaintiff

852451

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed with the clerk of the court for the U.S. District Court, using the electronic case filing system of the court. The electronic case filing system sent a Notice of Electronic Filing to the following who are ECF registered participants.

James G. Kreissman
SIMPSON THATCHER & BARTLETT LLP
2475 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 251-5025
Facsimile: (650) 251-5002
jkreissman@stblaw.com

Counsel for defendant Focus Media Holding Limited

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 26, 2013.

/S/ Stephen J. Oddo
STEPHEN J. ODDO